

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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IN RE:

Fraleg Jefferson Corp
dba Fraleg Quincy Corp
dba 931 Lincoln Place Corp

: CASE NO.: 24-41125-ESS

: CHAPTER: 11

: **Notice of Appearance**

: HON. JUDGE.: ELIZABETH S.
: STONG

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PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 11 case on behalf of Lima One Capital as servicer for Wilmington Trust, N.A., not in its individual capacity, but solely as trustee of MFRA Trust 2016-1, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO LLP

Attorneys for Lima One Capital as Servicer for
Wilmington Trust, N.A., not in its individual capacity, but
solely as trustee of MFRA Trust 2016-1
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a

waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: April 24, 2024

By: /s/ Michael L. Carey

Michael L. Carey, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Lima One Capital as Servicer for
Wilmington Trust, N.A., not in its individual capacity, but
solely as trustee of MFRA Trust 2016-1

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CERTIFICATION OF SERVICE

I, Michael L. Carey, Esq., certify that on April 24, 2024, I caused to be served a true copy of the annexed **NOTICE OF APPEARANCE** by mailing by First Class Mail in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service addressed to the last known address of the addressee, and the property address as indicated on the attached Service List annexed hereto.

By: /s/ Michael L. Carey

Michael L. Carey, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Lima One Capital as Servicer for
Wilmington Trust, N.A., not in its individual capacity, but
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SERVICE LIST

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